

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Abdullah Khabir YUSUF

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 19, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324

Offense Description

Knowingly or in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, did knowingly transport and move, attempt to transport and move, and conspire with other persons known and unknown, to transport and move, such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

See attachment "A"

☒ Continued on the attached sheet./s/ Juan DeArcos*Complainant's signature*Juan DeArcos HSI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 03/22/2021*Judge's signature*City and state: Laredo, TexasDiana Song Quiroga, US Magistrate Judge*Printed name and title*

ATTACHMENT "A"

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I, Juan DeArcos, a Homeland Security Investigations (HSI) Special Agent (SA), have knowledge of the following facts derived, in part, from either my personal observations, my training and experience, and/or information obtained from other agents and witnesses:

On March 19, 2021, a United States Border Patrol Agent (BPA) assigned to the Laredo, Texas (TX) immigration checkpoint located near mile marker 29 on Interstate Highway 35 (IH-35) encountered a red tractor hauling a flatbed trailer driven by Abdullah Khabir YUSUF. During the encounter, a BPA K-9 handler advised the BPA at the primary inspection that his service canine had alerted to the presence of concealed people and/or narcotics at the trailer. The BPA directed YUSUF to the secondary area for further inspection.

BPAs subsequently discovered eighty-four (84) individuals concealed underneath a large tarp that was wrapped around what appeared to be part of the commodity YUSUF was transporting. The eighty-four (84) individuals were determined to be undocumented noncitizens (UDNs) illegally present in the U.S. HSI SAs were notified and responded to conduct post-arrest interviews.

YUSUF was read his Miranda Rights in the English language, acknowledged his rights and agreed to speak to SAs without the presence of an attorney. YUSUF stated he acquired a job to haul a commodity from Laredo, TX to Dallas, TX. YUSUF stated he drove to Laredo, TX and dropped off his trailer at an unknown warehouse where it was to be loaded. YUSUF stated he left and returned approximately one (1) hour later to pick up the trailer. YUSUF stated he inspected his already loaded trailer and noticed the tarps were tied down properly so he hooked his tractor to the trailer and began his trip. YUSUF stated he was stopped at the checkpoint but did not know the UDNs were in the trailer. YUSUF stated he was going to get paid two thousand seven hundred (\$2,700) U.S. Dollars (USD) for transporting the load from Laredo, TX to Dallas, TX.

The following two (2) individuals were held as material witnesses relating to the tractor trailer apprehension and both admitted to illegally entering the U.S. by crossing the Rio Grande River. They also admitted they were to be smuggled to various cities throughout the U.S. for various amounts of money.

Miguel MANZO-Jimenez, a citizen and National of Mexico, stated he made arrangements to be smuggled into the U.S. for eleven thousand (\$11,000) USD. MANZO-Jimenez stated he was transported to an unknown location to board the trailer. MANZO-Jimenez stated an unknown male instructed them to get on the trailer in the Spanish language. MANZO-Jimenez stated once all UDNs boarded the trailer, the tractor trailer departed the location. MANZO-Jimenez stated the tractor trailer made a fifteen (15) minute stop but he did not know where. MANZO-Jimenez stated the tractor trailer continued traveling and did not stop until they arrived at the immigration checkpoint.

Jose Manuel VEGA-Garcia, a citizen and National of Mexico, stated he made arrangements to be smuggled into the U.S. for five thousand (\$5,000) USD. VEGA-Garcia stated he was transported to an unknown location where the tractor trailer was located. VEGA-Garcia stated the tractor was on when he arrived. VEGA-Garcia stated he saw an unknown male standing by the trailer who instructed him, in broken Spanish, to get on the trailer. VEGA-Garcia stated the tractor trailer departed the unknown location and did not stop until they arrived at the immigration checkpoint.